

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

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DIVISION

2006 APR 26 A 11:52

Elaine M. Coley Plaintiff) DEBRA P. HACKETT, CLERK
Alabama Medicaid) U.S. DISTRICT COURT
Agency Defendant(s)) MIDDLE DISTRICT ALA

2:06CV378-WKW

COMPLAINT

1. Plaintiff resides at 6321 Sandy Ridge Curve
Montgomery, AL 36117

2. Defendant(s)' name(s)
Alabama Medicaid Agency

Location of principal office(s) of the named defendant(s)

501 Dexter Avenue, Montgomery, AL 36103

Nature of defendant(s)' business State Medicaid agency

Approximate number of individuals employed by defendant(s) 500+

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 2000e-5(g).

4. The acts complained of in this suit concern:

1. Failure to employ me.
2. Termination of my employment.
3. Failure to promote me.
4. Other acts as specified below: discrimination in performance appraisals costing plaintiff promotional advancement opportunities. Defendant placed negative information in my personnel file as well.

SCANNED
04/27/06

5. Plaintiff is:

A. Presently employed by the defendant.
 Not presently employed by the defendant. The dates of employment were March 2000 - January 2005. Employment was terminated because:

(1) Plaintiff was discharged.
(2) Plaintiff was laid off.
(3) Plaintiff left job voluntarily.

6. Defendant(s)' conduct is discriminatory with respect to the following:

A. My race.
B. My religion.
C. My sex.
D. My national origin.
E. Other, as specified below: Retaliation because of complaints made to human resources regarding harassment and disparate treatment.

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is(are) Robin Rawls, Carol Herman, Lee Maddox and Mike Murphy.8. The alleged discrimination occurred on or about March 2003 until January 29, 2005.9. The nature of my complaint, i.e., the manner in which the individual(s) named above discriminated against me in terms of the conditions of my employment, is as follows: Please see attached.

10. The alleged illegal activity took place at my place of employment 501 Dexter Avenue, Montgomery, AL.

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s)' alleged discriminatory conduct on or about 12/21/2004. I have attached a copy of the Notice-of-Right-to-Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on 1/28/06.

12. I seek the following relief:

A. Recovery of back pay.
B. Reinstatement to my former job,
and any other relief as may be appropriate, including injunctive orders, damages, costs, and attorney's fees.

Date: 4-26-06

Galaxie M. Caley
Signature of Plaintiff
6921 Sandy Ridge Curve
Montgomery, AL 36011
205 360-06
Address & Telephone Number of Plaintiff